

1 JOHN DURRANT (SB# 217345)
john@durrantlawfirm.com
2 THE DURRANT LAW FIRM, APC
2337 Roscomare Rd. No. 2-180
3 Los Angeles, California 90077
Telephone: (424) 273-1962
4

Attorneys for Defendants
5 Translucence Research, Inc., Benjamin
Fisch, Charles Lu, Nathan McCarty,
6 Benedikt Bünz, and Binyi Chen and
Specially Appearing Defendant
7 Alex Xiong
8
9

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 TEMUJIN LABS INC., a Delaware
corporation, and TEMUJIN LABS INC., a
Cayman Islands corporation
14

Plaintiffs,
15

vs.
16

17 TRANSLUCENCE RESEARCH, INC., a
Delaware corporation, BENJAMIN FISCH,
CHARLES LU, BENEDIKT BÜNZ,
18 NATHAN MCCARTY, FERNANDO
KRELL, PHILIPPE CAMACHO CORTINA,
19 BINYI CHEN, AND LUOYUAN (ALEX)
XIONG, and DOES 1-20,
20

Defendants.
21
22
23
24
25
26
27
28

CASE NO. 5:21-cv-09152-NC

**APPEARANCE OF COUNSEL FOR
SPECIALLY APPEARING DEFENDANT
ALEX XIONG**

Complaint Filed: November 24, 2021

To the Clerk of the Court and all parties of record:

Undersigned Counsel hereby affirms that he is admitted and/or otherwise authorized to practice in this Court, and he appears in this case as counsel for: Specially Appearing Defendant Alex Xiong (“Mr. Xiong”).

Mr. Xiong hereby specially appears in this matter to reserve his right to contest any purported service of process on him, upon (i) the filing of any proof of service by Plaintiff Temujin Labs, Inc., a Cayman Islands Corporation and/or Plaintiff Temujin Labs, Inc., a Delaware Corporation purporting to reflect service upon Mr. Xiong; and (ii) any termination of the pending stay in this matter.

Moreover, to the extent Mr. Xiong is found to be duly served with process and following the expiration of any stay, he would join fully in a reasserted motion to dismiss filed by the other parties represented by undersigned counsel. (*See* ECF No. 65 Order Granting in Part Defendants’ Motion to Dismiss or Stay; Vacating CMC; Staying Case at 1, “This Order does not reach the other arguments raised in the motion to dismiss. Those arguments may be reasserted by Defendants after the stay is lifted.”; *see also* ECF No. 26, Motion to Dismiss.)

DATED: October 3, 2023

THE DURRANT LAW FIRM, APC

By: /s/ John Durrant
JOHN DURRANT

Attorneys for Defendants
Translucence Research, Inc., Benjamin Fisch, Charles
Lu, Nathan McCarty, Benedikt Bünz, and Binyi Chen
and
Specially Appearing Defendant Alex Xiong